

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-v-)	14 CR 135
)	Hon. Virginia M.Kendall
KAREN FINLEY,)	
)	
Defendant.)	

**DEFENDANT KAREN FINLEY’S
UNOPPOSED MOTION TO TRAVEL OUTSIDE THE CONTINENTAL UNITED
STATES**

NOW COMES the Defendant, KAREN FINLEY, by and through her attorneys, MONICO & SPEVACK, and respectfully asks the Court for permission to travel to Kauai, Hawaii, from February 5 through February 18, 2015 with her sister.

IN SUPPORT of this Motion, Defendant states:

1. On September 10, 2014, Judge Kendall released Ms. Finley on an Unsecured Bond with no reporting requirement to Pre-Trial Services.
2. The Unsecured Bond also allows Ms. Finley to travel within the continental United States without obtaining any prior permission.
3. Ms. Finley’s sister would like to take Ms. Finley to Kauai, Hawaii, in memory of their youngest sister’s passing two years ago.
4. Defense counsel has discussed this motion with AUSA Carrie Hamilton and Ms. Hamilton advised defense counsel that she does not object to the trip.

4. Defense counsel has also discussed this motion with Vanessa Velarde, the Pretrial Services Officer for Ms. Finley, and she too has advised defense counsel that she does not object to Ms. Finley's travel request.

5. Ms. Finley is in full compliance with all of the conditions of her bond.

WHEREFORE, Defendant respectfully requests that this Court allow her to travel to Kauai, Hawaii, from February 5 through February 18, 2015, as requested above.

Respectfully submitted,
KAREN FINLEY

By: /s/ Jacqueline S. Jacobson
One of her attorneys

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